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April 14, 2021

BY ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Richard Rubin and Thomas Craft*, 20 Cr. 632 (PAE)
Joint Request for Continuance

Dear Judge Engelmayer:

We represent Thomas Craft in connection with the above-referenced case. We write to request, on behalf of all parties, a continuance of the change of plea hearing currently scheduled for April 30, 2021.

The Government and both defendants are in continued discussions regarding a possible resolution of the case short of trial. This request is made in good faith and not for purposes of delay. Further, the interests of justice will be served and none of the parties will be prejudiced if the Court grants this motion. Accordingly, the parties respectfully request that the Court reschedule the change of plea hearing to June 1, 2021.

I have conferred with Assistant United States Attorney Martin Bell and Sean McGovern, counsel for Mr. Rubin, and they both join in this request to continue the change of plea hearing. In addition, Mr. Craft and Mr. Rubin both consent that the time under the Speedy Trial Act be excluded until June 1, 2021.

Respectfully submitted,

/s/
Christopher Bruno

cc: AUSA Martin Bell (By ECF)
AUSA Jordan Estes (By ECF)
Sean McGovern, Esq. (By ECF)
James Sallah, Esq. (By ECF)

GRANTED. The conference is adjourned to June 1, 2021 at 12:00 p.m.
For the reasons stated above, time is excluded, pursuant to 18 U.S.C. § 3161(h)(7)(A),
until June 1, 2021. The Clerk of Court is requested to terminate the motion at Dkt. No. 30.

4/15/2021

SO ORDERED.

A handwritten signature in blue ink, reading "Paul A. Engelmayer", is positioned above a horizontal line.

PAUL A. ENGELMAYER
United States District Judge